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March 22, 2024

VIA ELECTRONIC CASE FILING

Honorable Douglas E. Arpert, U.S.M.J.
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building and Courthouse
402 East State Street
Trenton, NJ 08608

Re: *His All Holiness Bartholomew I, et al. v. Princeton University*
Civil Case No. 3:18-CV-17195-RK-DEA

Dear Judge Arpert:

We represent Defendant, the Trustees of Princeton University, and respectfully submit this letter on behalf of the parties, with Plaintiffs' consent. This letter is submitted pursuant to Your Honor's order of March 13, 2024, directing the parties to submit a joint letter regarding existing discovery disputes by March 22, 2024. [ECF No. 148.]

In the parties' last status report to the Court, the parties informed the Court that certain depositions were scheduled for March 13 and March 15, 2024, and that they would inform the Court, by letter, of any existing discovery disputes and seek a briefing schedule. [ECF No. 147.] Having now conducted the depositions, and after engaging in a telephonic meet-and-confer,¹ Princeton expects

¹ Having worked well together in this action, the parties have committed to continuing to confer over these issues to see if they can limit, or narrow, any of the current discovery disputes. The proposed briefing schedule, outlined below, provides time for the parties to take additional actions, and then confer over those actions, in an effort to resolve or narrow certain disputes.

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to present discovery disputes regarding the following to the Court.²

1. Princeton's Request for Sanctions, or Other Evidentiary Relief, for Plaintiffs' Failure to Produce Prof. George Papazoglou for his Court Ordered Deposition;
2. The Production of the "Classification" Identified During the Deposition of Plaintiff, the Metropolis of Drama's, Deposition;
3. The Production of the Documents Provided to Metropolitan Dionysios by Prof. Papazoglou, Along with the Production of any Private or "Unregistered" Materials, as Referenced in, *inter alia*, Deposition Exhibit 15, Bates Label PAT0000081;
4. The Production of Certain Books Located at the Patriarchate Which Identify Monastery Manuscripts as Being Held in America and/or at Princeton, Including Books by Metropolitan Dionysios, the Monastery, Prof. Papazoglou, Kurt Weitzmann, Vasilies Atsalos, and Vasilis Katsaros;
5. The Production of Certain Time-Records by Plaintiffs' Counsel Regarding the Timing of Research Efforts Into the Location of Certain Manuscripts; and
6. The Production and/or *In Camera* Review of Certain Entries on Plaintiffs' Privilege Log.

The Parties propose that these disputes be presented to the Court in the following manner.

- | | |
|---------------------------|--|
| April 17, 2024 | - Parties to submit pre-motion letters pursuant to L. CIV. R. 37.1(a)(1) addressing the aforementioned discovery disputes. |
| May 1, 2024 | - Deadline for the Parties to submit responsive letters. |
| May 15, 2024 ³ | - Telephonic conference with the Court regarding the discovery disputes. |

² To the extent additional disputes become ripe over the course of the continued meet and confer process, the parties will advise the court as to those additional disputes before the respective deadline to submit pre-motion letters.

³ Or at any time thereafter convenient to the Court.



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Thank you for Your Honor's consideration.

Respectfully Submitted,
WONG FLEMING

By: /s/ Linda Wong
Linda Wong

And

HAHN LOESER
Samuel C. Sneed